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Before the POSTAL REGULATORY COMMISSION Washington, DC 20268-0001

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Mail Processing Network Rationalization)	Docket No. N2012-1
Service Changes, 2012)	
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DIRECT TESTIMONY OF KENNY HAYES ON BEHALF OF THE NATIONAL POSTAL MAIL HANDLERS UNION (NPMHU-T-6)

My name is Kenny Hayes. I am currently a Mail Handler employed by the United States Postal Service at the Charlestown, WV P&DC. Since February 2007, I have been President of Local 305 of the National Postal Mail Handlers Union (NPMHU), which represents approximately 5,000 Mail Handlers working in Maryland, the District of Columbia, Virginia, North Carolina and parts of West Virginia. I have been employed by the Postal Service since September 10, 1977 and have been active representing Mail Handlers since 1979.

The purpose of my testimony is to provide additional information to the Commission regarding the Postal Service's proposed consolidations in the Mid-Atlantic and Appalachian region. Based on my knowledge of these facilities, my many years as a Postal employee, and my review of the Area Mail Processing (AMP) studies of these consolidations, I believe that the Postal Service has under-estimated the effects its plans will have on the efficient processing and delivery of the mail.

On February 23, 2012, the Postal Service announced nine planned consolidations within my Local's jurisdiction, including Norfolk, Roanoke, Clarksburg, Cumberland MD, Lynchburg VA, Parkersburg, Petersburg, Asheville and Bluefield. Two of the largest planned consolidations involve the Norfolk P&DC into the Richmond P&DC, and the Roanoke, VA P&DC into Greensboro, NC P&DC.

These are not the first consolidations in my area. Within the past several years, there have been a number of consolidations, including consolidating all mail processing from Frederick, Maryland to either Baltimore or Suburban, MD; consolidating Charlottesville into Richmond;; Dulles P&DC originating mail into Merrifield, VA; Bristol P&DC into Johnson City, TN; Lynchburg P&DF into Roanoke; Hickory P&DF into Greensboro P&DC; and Kinston, NC into Fayetteville, NC. Several of these consolidations have caused problems in the efficient processing and delivery of the mail. For instance, after the Frederick consolidation into Baltimore, the Baltimore facility had major difficulties in handling the additional volume, particularly during the holiday rush. This resulted in news coverage, reporting that mail was sitting in the yard for eight to ten days due to backups. See

http://www.wbaltv.com/r/29985356/detail.html. The Office of Inspector General has begun an audit to review operational data from the Baltimore P&DC to assess the consolidation and examine stakeholder concerns into delayed mail and service declines. See

http://auditprojects.uspsoig.gov/2012/02/22/frederick-md-to-baltimore-md-amp-consolidation-12yq017no000/.

The Richmond P&DC, which has already absorbed the mail from Charlottesville and is scheduled to also receive the mail volume from Norfolk, has also been struggling to handle this increased mail volume. As one example, our Local, which is based in Richmond, sent a mailing to local members, and it took over a month for some members to receive the mailing. Although this is an extreme example, this is consistent with other complaints that we have been hearing regarding slow processing and delivery of mail.

In my experience and in my region, there is not currently excess staffing, given the current volumes of mail. There has been very little hiring in the Postal Service in recent years. Since I was first elected President of Local 305, our Local's membership has declined by about 900 members. In our area, the Postal Service is largely understaffed for Mail Handlers. Overtime among our members has increased in most of our facilities, and members are being required to work overtime even when they do not want to work overtime. By consolidating facilities or lengthening the operating windows, I do not believe that the Postal Service will be able to significantly decrease the number of hours worked. The main effect will be to move employees between facilities, which will cost the Postal Service more money.

In addition, I do not believe that the Postal Service has paid adequate attention to community concerns in this process. The Branch Presidents in my Local or other union officials attended the public hearings for the consolidations within my Local jurisdiction and reported back to me on the hearings. The Postal representatives at these hearings did not appear to be adequately informed to answer questions about the information and figures that they were presenting to the public. The Postal Service did not seem interested in public comments, and frequently cut off postal employees and union officials who tried to comment or ask questions.

Many of the planned consolidations affect small communities and rural areas. Many of these small communities do not have many jobs, and losing these postal jobs is a major blow to these communities. In addition, in many rural communities, the residents rely more heavily on Postal services, as they may not have ready access to the internet, pharmacies, competitor mailers, or retail options. Some of these rural areas also have a higher percentage of senior citizens, which depend more heavily upon the U.S. Mail. For instance, according to the 2010 U.S. Census, Alleghany County, Maryland (where the Cumberland facility is located) has 17.8% of its population over age 65, as compared with 13% nationwide. Similar populations are seen in Roanoke County, Virginia (with 17.2% of its population over age 65); and Grant County, WV, where the Petersburg, WV facility is located (with 18.3% of its population over age 65). Slowing

the mail for these individuals is particularly troubling for the Postal Service, which is charged with providing service to all areas of our country.

Respectfully submitted,

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